

Mark C. Mao, CA Bar No. 236165
 Beko Reblitz-Richardson, CA Bar No. 238027
 Erika Nyborg-Burch, CA Bar No. 342125
BOIES SCHILLER FLEXNER LLP
 44 Montgomery St., 41st Floor
 San Francisco, CA 94104
 Tel.: (415) 293-6800
 mmao@bsfllp.com
 brichardson@bsfllp.com
 enyborg-burch@bsfllp.com

James Lee (admitted *pro hac vice*)
 Rossana Baeza (admitted *pro hac vice*)
BOIES SCHILLER FLEXNER LLP
 100 SE 2nd St., 28th Floor
 Miami, FL 33131
 Tel.: (305) 539-8400
 jlee@bsfllp.com
 rbaeza@bsfllp.com

Amanda K. Bonn, CA Bar No. 270891
SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067
 Tel: (310) 789-3100
 Fax: (310) 789-3150
 abonnn@susmangodfrey.com

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,
 JEREMY DAVIS, CHRISTOPHER
 CASTILLO, and MONIQUE TRUJILLO
 individually and on behalf of all similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody
 (admitted *pro hac vice*)
 Shawn J. Rabin (admitted *pro hac vice*)
 Steven M. Shepard (admitted *pro hac vice*)
 Alexander Frawley (admitted *pro hac vice*)
SUSMAN GODFREY L.L.P.
 1301 Avenue of the Americas,
 32nd Floor
 New York, NY 10019
 Tel.: (212) 336-8330
 bcarmody@susmangodfrey.com
 srabin@susmangodfrey.com
 ssh Shepard@susmangodfrey.com
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)
 Ryan J. McGee (admitted *pro hac vice*)
MORGAN & MORGAN
 201 N. Franklin Street, 7th Floor
 Tampa, FL 33602
 Tel.: (813) 223-5505
 jyanchunis@forthepeople.com
 mram@forthepeople.com
 rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805
MORGAN & MORGAN
 711 Van Ness Ave, Suite 500
 San Francisco, CA 94102
 Tel: (415) 358-6913
 mram@forthepeople.com

Case No.: 5:20-cv-03664-YGR-SVK

**PLAINTIFFS' ADMINISTRATIVE
 MOTION TO CONSIDER WHETHER
 PORTIONS OF PLAINTIFFS' REQUEST
 FOR ORDER TO SHOW CAUSE RE:
 SANCTIONS FOR GOOGLE'S
 DISCOVERY MISCONDUCT**

Referral: The Honorable Susan van Keulen

Pursuant to Civil Local Rule 79-5, Plaintiffs respectfully ask the Court to consider whether Google LLC (“Google”)’s material should be sealed. This material is included in Plaintiffs’ Request for an Order for Google to Show Cause For Why It Should Not Be Sanctioned for Discovery Misconduct (the “Request”). The material has been designated by Google as “Confidential” or “Highly Confidential – Attorneys’ Eyes Only.” This motion to seal pertains to the following information in the Request

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
The Request	Google	Portions highlighted throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Mao Declaration	Google	Portions highlighted throughout	Refers to material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order
Exhibits 1-25 to Mao Declaration	Google	Entirety	Material designated “Confidential” and “Highly Confidential” pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(f), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Dated: February 26, 2022

Respectfully submitted,

By: /s/ John A. Yanchunis

Mark C. Mao (CA Bar No. 236165)
mmao@bsfllp.com

Beko Rebitz-Richardson (CA Bar No. 238027)
brichardson@bsfllp.com

Erika Nyborg-Burch (CA Bar No. 342125)
Enyborg-burch@bsfllp.com

BOIES SCHILLER FLEXNER LLP
44 Montgomery Street, 41st Floor
San Francisco, CA 94104

1 Telephone: (415) 293 6858
2 Facsimile (415) 999 9695

3 James W. Lee (*pro hac vice*)
4 jlee@bsflp.com
5 Rossana Baeza (*pro hac vice*)
6 rbaeza@bsflp.com
7 BOIES SCHILLER FLEXNER LLP
8 100 SE 2nd Street, Suite 2800
9 Miami, FL 33130
10 Telephone: (305) 539-8400
11 Facsimile: (305) 539-1304

12 Amanda Bonn (CA Bar No. 270891)
13 abonn@susmangodfrey.com
14 SUSMAN GODFREY L.L.P.
15 1900 Avenue of the Stars, Suite 1400
16 Los Angeles, CA 90067
17 Telephone: (310) 789-3100

18 William Christopher Carmody (*pro hac vice*)
19 bcarmody@susmangodfrey.com
20 Shawn J. Rabin (*pro hac vice*)
21 srabin@susmangodfrey.com
22 Steven Shepard (*pro hac vice*)
23 sshepard@susmangodfrey.com
24 Alexander P. Frawley (*pro hac vice*)
25 afrawley@susmangodfrey.com
26 SUSMAN GODFREY L.L.P.
27 1301 Avenue of the Americas, 32nd Floor
28 New York, NY 10019
Telephone: (212) 336-8330

John A. Yanchunis (*pro hac vice*)
jyanchunis@forthepeople.com
Ryan J. McGee (*pro hac vice*)
rmcgee@forthepeople.com
MORGAN & MORGAN, P.A.
201 N Franklin Street, 7th Floor
Tampa, FL 33602
Telephone: (813) 223-5505
Facsimile: (813) 222-4736

Michael F. Ram, CA Bar No. 104805
MORGAN & MORGAN
711 Van Ness Ave, Suite 500
San Francisco, CA 94102
Tel: (415) 358-6913
mram@forthepeople.com

Attorneys for Plaintiffs

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28